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7 IN THE UNITED STATES BANKRUPTCY COURT
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA

9 In re: Case No. 10-59396
10 Majid Marhamat Chapter 7
11
12 _____ / NOTICE OF MOTION TO AVOID JUDICIAL
LIEN UNDER 11 U.S.C. §522 (f)(1)(A) AND OF
OPPORTUNITY TO REQUEST HEARING
(Lawrence Wu and Melea Men)

13 NOTICE IS HEREBY GIVEN that the debtor(s) have filed herewith a MOTION TO
14 AVOID JUDICIAL LIEN UNDER 11 U.S.C. §522 (f)(1)(A) (Lawrence Wu and Melea Men).
15 You are notified that, pursuant to Bankruptcy Rule 2002, you are given twenty-one (21) days
from the date of mailing of this notice to request a hearing on this Application. Such a request
shall be filed with the Clerk of the U.S. Bankruptcy Court at the following address:

16 Clerk of the
17 U. S. Bankruptcy Court
280 South First Street, Room 3035
18 San Jose, CA 95113-3099

19 **Bankruptcy Local Rule 9014-1 of the United States Bankruptcy Court for the
Northern District of California prescribes the procedures to be followed and any objection
to the requested relief, or a request for hearing on the matter must be filed and served
upon the requesting party within 21 days of mailing of the notice;**

20 **A request for a hearing or objection must be accompanied by any declarations or
memoranda of law the party objecting or requesting wishes to present in support of its
position;**

21 **If there is not a timely objection to the requested relief or a request for hearing, the
court may enter an order granting the relief by default; and**

22 **The initiating party will give either (1) at least 10 days written notice of hearing to
the objecting or requesting party, and to any trustee or committee appointed in the case, in
the event an objection or request for hearing is timely made, or (2) at least 10 days written
notice of the tentative hearing date.**

23 Dated: August 21, 2017

24 /s/ Nancy Weng

25 Nancy Weng, Esq.

26 Attorney for Petitioner/Debtor

1 **PROOF OF SERVICE BY MAIL AND ECS TRANSMISSION**

2 I declare as follows:

3 I am over the age of eighteen years, and not a party to this action and my office address is 99 N.
1st Street, Suite #200, San Jose, CA 95113.

4 On August 23, 2017, I served the attached:

5 1. **NOTICE OF MOTION TO AVOID JUDICIAL LIEN UNDER 11 U.S.C. §522
(f)(1)(A) AND OF OPPORTUNITY TO REQUEST HEARING (Lawrence Wu and
Melea Men);**

6 2. **MOTION TO AVOID JUDICIAL LIEN UNDER 11 U.S.C. §522 (f)(1)(A) AND OF
OPPORTUNITY TO REQUEST HEARING (Lawrence Wu and Melea Men); and**

7 3. **DECLARATION OF MAJID MARHAMAT, DEBTOR, IN SUPPORT OF
MOTION TO AVOID JUDICIAL LIEN UNDER 11 U.S.C. §522 (f)(1)(A)
(Lawrence Wu and Melea Men)**

8 **BY CERTIFIED USPS:** By placing a true copy thereof, enclosed in a sealed envelope with
postage thereon fully prepaid, for deposit in the United States Postal Service addressed:

9 Lawrence Wu and Melea Men
10 c/o Stephen R. Oliver
11 Oliver & Stephenson
12 2176 The Alameda
13 San Jose, CA 95126

14
15 **BY ELECTRONIC TRANSMISSION:** I caused to be served the above-described
document(s) by means of electronic transmission of the Notice of Electronic Filing through the
Court's transmission facilities, to the following parties and/or counsel who are registered ECF
users.

16 Mohamed Poonja mpoonja@sbcglobal.net, mpoonja@ecf.epiqsystems.com

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18
19 I certify and declare under penalty of perjury under the laws of the United States of
America that the foregoing is true and correct and that this declaration was executed at Glen
Ellen California, on August 23, 2017.

20
21 /s/ Steve Kolkey
22 Steve Kolkey